



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

February 15, 2000

Major Richard Jones
State of Indiana Military Department
Office of the Adjutant General
2002 South Holt Road
Indianapolis, IN 46241

EPA Region 5 Records Ctr.



375108

Dear Major Jones:

Re: Final Site Investigation (SI) Report,
Chemical Warfare Materials (CWM) Site,
Atterbury Reserve Forces Training Area,
Edinburgh, Indiana

Staff of the Indiana Department of Environmental Management (IDEM) have reviewed the above referenced document. Based on the investigation of the suspected CWM burn area, the data support no further action for this site. The proposed No Further Remedial Action Planned (NFRAP) memo should include an interpretation of the mustard agent results listed in Appendix A. The interpretation should also explain the difference between "contaminated level (dry soil)" and "corrected contamination level." If you have any questions, please feel free to contact Rex Osborn at (317) 234-0351 or myself at (317) 234-0358.

Sincerely,

Stephanie Riddle, Project Manager
Federal Programs Section
Office of Land Quality

SR:mg

cc: Rex Osborn, IDEM

Interpretation of the Mustard Agent Results

Appendix A of the Report includes the field screening results of the soil and sediment samples. The 10 sediment soil samples and three sediment samples were analyzed using a modified chromatograph (MINICAMS), as described in Section 4.1 of the report. The MINICAMS analyzed the soil/sediment samples for chemical agent HD (Mustard Agent). The results listed in Appendix A are the HD detections, which are below the detection limits.

Contamination Level (Dry Soil) vs. Corrected Contamination Level

The Contamination Level (Dry Soil) are the results of the MINICAMS detections. The Corrected Contamination Level accounts for the extraction. As described in the second to last paragraph of the letter in Appendix A, two soil and one sediment samples were randomly selected for QA/QC purposes, and spiked with HD at three times the detection limit, extracted, and analyzed. The method was able to recover 60% from the soils and 70% from the sediment. The extraction was not able to get 100% back; therefore, the Corrected Contamination Level accounts for the extraction efficiencies.

March 10, 2000

DECISION DOCUMENT

FOR NO FURTHER REMEDIAL ACTION PLANNED

AT THE SUSPECTED CHEMICAL AGENT BURN SITE,

CAMP ATTERBURY, EDINBURGH, INDIANA

PURPOSE OF DECISION DOCUMENT

This Decision Document discusses reasons why a No Further Remedial Action Planned (NFRAP) response for the Chemical Warfare Material (CWM) site at Camp Atterbury, Edinburgh, Indiana, is appropriate. This document was developed in accordance with the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA), and to the extent practicable, the National Contingency Plan. This document was developed by the Installation Restoration Program (IRP), Army National Guard.

SUMMARY OF DECISION TO CONDUCT NO FURTHER ACTION

In 1991, a former employee of the Military Department of Indiana (MDI) Environmental Management Division conducted an informal investigation of possible disposal of blister agent at Camp Atterbury, Indiana between 1968 and 1970. Based on accounts of the incident, approximately 25-30 one-gallon cans of a thick liquid substance were discovered in an old bunker and burned in a pit adjacent to the bunker. Because the substance could not be identified, the soldiers wore protective masks and leather gloves during disposal. The former employee determined, based on this information, that the substance was blister (mustard) agent. On 19 September 1991, the Director of Facilities and Engineering sent a memo to NGB-ARE formally reporting the blister agent site. As a result of the memo, the Atterbury site was listed as a disposal site by the Non-Stockpile Chemical Material Program (Interim Survey and Analysis Report, April 1993).

In 1993, Roy F. Weston, Inc. (Weston) completed a Preliminary Assessment (PA) for Camp Atterbury. The report identified several potential areas of concern at Camp Atterbury. The CWM site was not identified as an area of concern in that or any previous investigations.

The Indiana Department of Environmental Management (IDEM), in a meeting with Military Department of Indiana (MDI) and its contractor, Montgomery Watson, on 2 August 1996, recommended that a site investigation be conducted to determine if blister (mustard) agent or constituents remain at the site. At that time, MDI did not plan to conduct any further investigations at the site.

Montgomery Watson conducted a limited Site Investigation (SI) in 1998 at the suspected CWM site. The objective of the limited SI was to determine if blister agent or its breakdown products were present at the site. The limited SI included soil and sediment sampling. Soil samples were collected along with sediment samples from the stream located at the site and analyzed for blister agent and its breakdown products. None of the samples taken contained concentrations of blister agent or breakdown products.

SUMMARY OF SITE RISK

A SI was conducted at the suspected CWM site in 1998 by Montgomery Watson to determine the impacts on public health and the environment from the existence of blister agent or breakdown compounds. The SI included soil and sediment sampling.

a. A total of 10 soil borings were taken on site; 3 from the area identified as the burn site and seven down gradient from the site. Samples were analyzed for blister agent and its breakdown components (organosulfur compounds and thioglycol). No concentration of blister agent or breakdown compounds were found in any of the samples.

b. Three sediment samples were collected from the stream, which borders the northeastern portion of the site. Sediment samples were also analyzed for blister agent and its breakdown compounds. None of the samples contained any concentration of blister agent or breakdown compounds.

PUBLIC/COMMUNITY INVOLVEMENT

It is Department of Defense (DoD) and Army Policy to involve the local community as early as possible and throughout the installation and restoration process of an installation. A Community Relations Plan (CRP) is not necessary at this installation, so "community" involvement is limited to interviews of personnel in the immediate area with the intent to use the information to conduct appropriate research.

DECLARATION

The SI determined that no blister agent or breakdown compounds are present in soil or sediments at the CWM site at Camp Atterbury.

The decision to conduct the NFRAP is based on the analytical data included in the SI. No further action is required at this time.



SCOTT G. HILYARD

Chief, Installation Restoration Program
Branch

December 20, 1999

Directorate of Facilities, Engineering, and Environmental

Mr. Rex Osborn
Chief, DEP Program
Office of Environmental Response
Indiana Department of Environmental Management
100 N. Senate
P.O. Box 6015
Indianapolis, IN 46206-6015

Dear Mr. Osborn:

Enclosed please find the Final Site Investigation (SI) Report for the suspected CWM Site at Camp Atterbury.

After a meeting with your office on August 6, 1996, the Military Department had decided not to take any further action at the site. However, due to recent emphasis on identifying and cleaning up potential chemical warfare sites by the Department of the Army and the availability of funding to conduct the investigation, we decided to conduct the SI.

Results of soil and sediment sampling indicate no evidence of blister (mustard) agent or breakdown compounds at the site. I will be sending a No Further Remedial Action Planned (NFRAP) memo for your review and will ask for your concurrence to begin the process to formally close out the site. The NFRAP will then be forwarded to National Guard Bureau and EPA.

If you have any questions, you may contact me at 247-3105 or e-mail jonesrw@in-arng.ngb.army.mil.

Sincerely,

Enclosure
as stated

Richard W. Jones
Major, Indiana Army National Guard
Supervisory Environmental Specialist

FFID: IN211818000

PRJ# IN00002005

Installation Name: STARC - IN	FFID: IN-211818000	Major Command: ARNG
Abbreviation: STARC-IN	Property Number: 18000	Support Installation:
Street Address: 2002 SOUTH HOLT ROAD		ASG:
City: INDIANAPOLIS	State: INDIANA	BSB:
Local Information:	Country: US Zip: 46241-4839	Installation Type: SUBINSTALLATION
Project Name: SECONDARY CONTAINMENT-CSMS2	Congressional District:	Ownership Type: SOSO
Agency Project Number: IN00002005	Multiple Installations: N	Subcommand: IN
Date First Entered: 10/08/1999	Date of Last Revision: 10/08/1999	
Reason for Initiation:		Law/Reg Area: CWA
Pillar: Compliance	Must Fund: Y	Environmental Category: SPCC
Geographic Initiative:		Class: 1
Program Area: CONTAINMENT	Design/Plan Completion:	Compliance Status: ESDP
Progress Code: 1-Preliminary Planning	Construction/Work Started:	Project Assessment: H
Date Completed:	Construction/Work Completed:	Required Compliance Date: 09/30/2001
Date Discontinued:		Year Funding Required:
Reason Discon:		Total Cost Estimate: \$56,000
Project Type:	Command Priority:	Project Contact Name: MAJ RICHARD W. JONES
Other Project ID Type:	Local Priority: 27	Contact Telephone: (317)247-3105
Other Project ID:		
P2 Category:	P2 Used for CMP: N	

<u>Fund Code</u>	<u>AMS Code</u>	<u>FY</u>	<u>Required</u>	<u>Prog/Bdgt</u>	<u>Obligated</u>	<u>Fund Code</u>	<u>AMS Code</u>	<u>FY</u>	<u>Required</u>	<u>Prog/Bdgt</u>	<u>Obligated</u>
OMNG(VENC)	131G56.21	2002	\$56,000	\$56,000							

Narrative: PROJECT CONSISTS OF CONSTRUCTING SECONDARY CONTAINMENT FOR FUEL TANKERS. CURRENTLY, NO SECONDARY CONTAINMENT IS PROVIDED FOR TANKERS IN VIOLATION OF 40 CFR. LACK OF ADEQUATE SECONDARY CONTAINMENT COULD RESULT IN A COSTLY CLEANUP IN THE EVENT OF A SPILL. BECAUSE OF THE PROXIMITY OF PRIVATE PROPERTY TO ARMORIES, THERE IS A HIGH PROBABILITY THAT A SPILL WOULD LEAVE THE ARMORY PROPERTY, CONTAMINATING PRIVATE PROPERTY. FAILURE TO FUND MAY CONSTITUTE VIOLATION OF INDIANA SPILL RULE, CLEAN WATER ACT, AND STORMWATER REGULATIONS.